

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION**

IN RE:

REFRESHING USA, LLC

Debtor¹

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§
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Chapter 11

**CASE NO. 24-33919
(Jointly Administered)**

**DECLARATION OF MARTIN KRESHON ISO MOTION FOR RELIEF FROM STAY
AS TO CERTAIN WATER MACHINES**

I, Martin Kreshon, do hereby swear and affirm as follows:

1. I am an attorney for Plaintiff James Group International LLC ("*James Group*"). I am of legal age and competent to testify to the matters contained herein.

¹ 1 Debtors and debtors in possession these Chapter 11 cases ("Bankruptcy Case(s)"), along with the last four digits of their respective Employer Identification Numbers, are as follows: Refreshing USA, LLC (85-3358945) ("Refreshing"), Case No. 24-33919; Water Station Management LLC (81-1202716) ("Water Station"), Case No. 24-33924; and Creative Technologies, LLC (46- 2581888) ("Creative" and, together with Refreshing and Water Station, "Debtors"), Case No. 24- 33934. Debtors' mailing address is: 2732 Grand Ave., Ste. 122, Everett, WA 98201

DECLARATION OF MARTIN KRESHON ISO
MOTION FOR RELIEF FROM STAY AS TO
CERTAIN WATER MACHINES
NO. 24-33924-ARP, NO. 24-33919-ARP,
NO. 24-33934-ARP (1)

NORTH CITY LAW, PC
17713 Fifteenth Avenue NE, Suite 101
Shoreline, WA 98155-3839
Phone: 206.413.7288
Fax: 206.367.0120

2. On October 30, 2024, at 2:44 PM, I emailed Danny Newman and Ava Shoen, Debtors' counsel.

3. In that email, I provided counsel with a description of the facts set forth in James Group's motion and asked counsel whether or not they would be willing to consent to James Group's requested relief.

4. On November 4, 2024, at 5:57, Debtors' counsel responded, stating that Debtors were not in a position to consent to the relief requested.

EXECUTED this Wednesday, November 6, 2024, in Kenmore, Washington.

I, the undersigned, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

/s/ Martin Kreshon
Martin J. Kreshon III

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